

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

DANNE L. JOHNSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-08-1318-HE
	)	
OKLAHOMA CITY UNIVERSITY &	)	
LAWRENCE K. HELLMAN,	)	
	)	
Defendants.	)	

**DEFENDANTS' EXHIBIT LIST**

No.	Title	Bates-Number	Will Use	May Use
1	April 16, 2008 Grievance with October 2007 memo to J. William Conger attached	D Johnson 00422-00457	X	
2	Plaintiff's Interrogatory Answers		X	
3	Plaintiff's Supplementary Interrogatory Answers		X	
4	Memo from Liz Hedrick to Patricia Hatamyar and Plaintiff acknowledging grievance 4/25/08	D Johnson 00395		X
5	Emails between Patricia Hatamyar and Bernie Patterson re: status of grievance 4/29/08 and 4/30/08	D Johnson 00475-00476		X
6	Memo from Patricia Hatamyar and Plaintiff to Liz Hedrick re: grievance 5/1/2008	D Johnson 00392-00394		X
7	Email from Bernie Patterson to Patricia Hatamyar and Plaintiff with Protocol attached 5/5/2008	D Johnson 00477-00486	X	
8	Memo from Patricia Hatamyar and Plaintiff to Bernie Patterson re: Protocol	D Johnson 00497		X
9	Letter to Von Creel re: appointment to grievance panel 6/17/08	OCU-Johnson 12840-12841		X

10	Letter to Plaintiff from Liz Hedrick re: panel members 6/18/08	D Johnson 00396		X
11	Email from Patricia Hatamyar to Bernie Patterson, Susan Barber, Liz Hedrick, Tom McDaniel, Lawrence Hellman, and Danne Johnson re: notifying male faculty of grievance 6/22/08	OCU-Johnson 13965	X	
12	Email from Bernie Patterson to PH and Plaintiff re: notifying male faculty of grievance 6/23/08	OCU-Johnson 13964	X	
13	Memo to Patricia Hatamyar and Plaintiff from Liz Hedrick re: withdrawal of grievance 6/24/08	D Johnson 00397		X
14	Emails between Plaintiff and Marc Blitz re: 2006 Constitution Day 6/29/06 – 6/30/06	D Johnson 00500-00513	X	
15	Email from Patricia Hatamyar to Plaintiff and Carla Spivack re: Review of Marc Blitz 9/27/07	D Johnson 00311	X	
16	Email from Patricia Hatamyar to Andrew Spiropolous, Charles Cantrell, Lawrence Hellman and Bill Conger re: Review of Marc Blitz 10/11/07	OCU-Johnson 14702	X	
17	Emails between Plaintiff and Gayle Barrett re: Marc Blitz 2/19/08 and 2/28/08 and emails regarding same between Gayle Barrett and J. William Conger 2/28/08	OCU-Johnson 02003-02005		X
18	Emails between Paula Dalley and Plaintiff and Patricia Hatamyar and Plaintiff re: Marc Blitz	D Johnson 00375-00376	X	
19	Dr. Skarkey Notes dated 6/18/08	Johnson – Dr. Skarky 015	X	

20	Email from J. William Conger to Patricia Hatamyar, Plaintiff, Paula Dalley, Vicki MacDougall, Carla Spivak, Deborah Fathree and Gina Rowsam re: Women in Law Panel 9/24/07 and response of Patricia Hatamyar thereto	D Johnson 00100-00101		X
21	Emails between Patricia Hatamyar, Plaintiff, Paula Dalley, and Carla Spivak re: Women in Law panel 9/24/07	D Johnson 00149-00152		X
22	Email from J. William Conger to law faculty re: internal investigation with letter attached 2/19/08; and emails between Plaintiff, Carla Spivak, Patricia Hatamyar and Paula Dalley re: same	D Johnson 00368-00370	X	
23	Email from Plaintiff to J. William Conger and Gayle Barrett re: letter to faculty 2/20/2008; email from J. William Conger to Plaintiff re: same	D Johnson 00361-00362		X
24	Whistleblower policy	D Johnson 00499-00500	X	
25	Email from Plaintiff to Marc Blitz, Dennis Arrow, Charles Cantrell, Michael O'Shea and Andrew Spiropolous re: 2007 Constitution Day Panel 9/17/07; Email from Plaintiff to Lawrence Hellman and Eric Laity re: same	OCU-Johnson 11603-11604	X	
26	Emails between Carla Spivak, Plaintiff, Marc Blitz, Dennis Arrow, Charles Cantrell, Michael O'Shea, Andrew Spiropolous, and Paula Dalley re: 2007 Constitution Day Panel and suggestions for future panel events 9/17/09	D Johnson 00324-00325	X	
27	Additional email from Marc Blitz to Plaintiff re: panels 9/18/09	D Johnson 00326-00327	X	

28	Emails between Andrea Painter, Paula Dalley, Deborah Fathree, Plaintiff, Carla Spivak, Gina Rowsam and Patricia Hatamyar re: Domestic Violence program 10/11/2007 - 10/15/2007	D Johnson 00269-00272	X	
29	Email from Paula Dalley to Carla Spivak, Plaintiff and Patricia Hatamyar re: letter drafted for Lawrence Hellman 9/18/2007	D Johnson 00306		X
30	Proposed email to faculty re: gender issues	D Johnson 00332		X
31	Standard & Procedures for Retention, Promotion, and Tenure	D Johnson 00170-00199	X	
32	Standards & Procedures for Retention, Promotion, and Tenure [The Appendix Document of The School of Law]	D Johnson 00200-00250	X	
33	Memo from Eric Laity and Art LeFrancois re: Plaintiff deferring promotion 12/16/05	OCU-Johnson 02074	X	
34	Email from Plaintiff to Patricia Hatamyar re: faculty lounge proposal 3/27/06; Email from Patricia Hatamyar to Lawrence Hellman re: same 3/27/06	OCU-Johnson 06645-06646	X	
35	Email from Lawrence Hellman to Plaintiff re: recommendation for promotion and Plaintiff's response thereto 2/6/2007	OCU-Johnson 15620	X	
36	Email from Lawrence Hellman to law faculty announcing Plaintiff's promotion 4/26/07	OCU-Johnson 11454		X
37	Memo from Michael Gibson and Art LeFrancois to Thomas Odom re: Promotion and Tenure Board 11/18/02	OCU-Johnson 13729	X	
38	Memo from Michael Gibson & Art LeFrancois to Promotion and Tenure Board re: Thomas Odom 1/31/03	OCU-Johnson 13725	X	
39	Faculty publications through January 21, 2009	OCU-Johnson 13396-13444	X	

40	11/11/04 Memo from Norwood Beveridge and Von Creel to Promotion and Tenure Board re: Plaintiff	OCU-Johnson 02078-02082		X
41	Email from Plaintiff to Lawrence Hellman re: Don Imus and the law school experience 4/11/07; Lawrence Hellman's response thereto 4/22/07	OCU-Johnson 15645-15646	X	
42	2004 faculty evaluations by Patricia Hatamyar	OCU-Johnson 13379-13381	X	
43	2005 faculty evaluations by Patricia Hatamyar	OCU-Johnson 11694-11695	X	
44	2006 Faculty evaluations by Patricia Hatamyar	OCU-Johnson 11691-11693	X	
45	Plaintiff 2007 questionnaire	OCU-Johnson 13961-13963	X	
46	Emails between Plaintiff and Lawrence Hellman re: 2009 evaluation 4/21/2009 – 4/28/2009	OCU-Johnson 13950-13951	X	
47	Emails between Plaintiff and Eric Laity re: request to change performance evaluation 5/9/2009 – 5/12/2009	Bates-number to be provided	X	
48	Emails between Plaintiff and Eric Laity re: attending graduation 12/3/2008 – 12/4/2008	OCU-Johnson 15760-15761		X
49	Emails between Carla Spivack, Plaintiff, Patricia Hatamyar and Paula Dalley re: faculty meeting agenda item 9/24/2007	D Johnson 00087- 00088		X
50	Email from Patricia Hatamyar to Plaintiff, Paula Dalley and Carla Spivack re: meeting with Larry Hellman on agenda item 10/2/2007	D Johnson 00342	X	
51	Email from Patricia Hatamyar to Lawrence Hellman re: agenda item 10/3/07	OCU-Johnson 14696		X
52	October 5, 2007 faculty meeting agenda	OCU-Johnson 00525	X	

53	October 5, 2007 faculty meeting minutes	OCU-Johnson 11668-11670	X	
54	Email from J. William Conger to Patricia Hatamyar, Paula Dalley, Carla Spivak and Plaintiff re: independent investigation 10/5/2007; Email responses between Patricia Hatamyar, Paula Dalley, Carla Spivak and Plaintiff re: same	D Johnson 00142- 00144	X	
55	Email from Alvin Harrell to Lawrence Hellman, Eric Laity and Law Faculty re: Resolution about tobacco ban 5/1/2008; email response from Patricia Hatamyar re: same	OCU-Johnson 14743		X
56	Email from Patricia Hatamyar to law faculty and law administrative council members re: violations of faculty meeting rules 5/5/2008	OCU-Johnson 14744		X
57	Email from Patricia Hatamyar to Norwood Beveridge, Richard Coulson and Lawrence Hellman re: Michael O'Shea 10/9/2007	OCU-Johnson 11654		X
58	Email from Patricia Hatamyar to Lawrence Hellman, Bill Conger, Deborah Fathree, Andrew Spiropolous and Michael O'Shea re: Federalist Society Speaker 3/8/2008 and responses thereto	OCU-Johnson 14734-14737	X	
59	Email from Plaintiff to Lawrence Hellman and Eric Laity re: upcoming Federalist society event 3/8/2008	OCU-Johnson 15699	X	
60	Email from Andrew Spiropolous to Lawrence Hellman and Bill Conger re: Federalist society speaker 3/8/2008	OCU-Johnson 11643-11646		X
61	Emails between J. William Conger, Paula Dalley, Plaintiff, Carla Spivak, and Patricia Hatamyar re: meeting to discuss women in the law panel 9/25/07	D Johnson 00137- 00138		X

62	Email from Patricia Hatamyar to Lawrence Hellman re: meeting with J. William Conger 10-3-2007	OCU-Johnson 14695	X	
63	Email from J. William Conger to Patricia Hatamyar, Paula Dalley, Carla Spivak, and Plaintiff re: independent investigation 10/5/07	D Johnson 00334	X	
64	Emails between Carla Spivak, Paula Dalley, Patricia Hatamyar and Plaintiff re: list of grievances for investigation 10/5/07	D Johnson 00089- 00090		X
65	Additional emails between Carla Spivak, Paula Dalley, Patricia Hatamyar and Plaintiff re: completion of list of grievances for investigation 10/5/07	D Johnson 00102- 00103		X
66	Emails between Patricia Hatamyar and Plaintiff re: changes to October 10 <sup>th</sup> memo 10/9/07	D Johnson 00105	X	
67	Committee assignments for Plaintiff, Marc Blitz, Carla Spivack 2003-2009	OCU-Johnson 13971		X
68	2009-2010 Faculty Committees	OCU-Johnson 16376-16378		X
69	Emails between Plaintiff and Lawrence Hellman re: Law Technology Committee 9/22/2004 – 9/23/2004	OCU-Johnson 15395-15396		X
70	Emails between Plaintiff and Lawrence Hellman re: Plaintiff's selection for the Executive Committee of American Associates of Law School Women's Section 12/1/2006 – 1/23/2007	OCU-Johnson 15615-15616		X
71	Emails between Plaintiff and Lawrence Hellman re: publicizing Plaintiff's position on the Executive Committee of American Associates of Law School Women's Section 4/5/2008	OCU-Johnson 15706-15708		X
72	Emails between Deborah Fathree and Plaintiff re: Plaintiff not mentoring 7/16/08	OCU-Johnson 15728-15730		X

73	Emails between Plaintiff and Lawrence Hellman re: photo of female faculty 8/21/05	OCU-Johnson 15470-15471	X	
74	Emails between Plaintiff and Lawrence Hellman re: Law School Diversity Advisory Board 1/24/06	OCU-Johnson 15511		X
75	Email from Plaintiff to Tamara Martinez – Anderson, Jean Giles, Daniel Morgan, Peter Dillon, Charles Cantrell and Lawrence Hellman re: women in law schools 8/8/07 and responses thereto	OCU-Johnson 15631-15634	X	
76	Email from Tamara Martinez-Anderson to Jean Giles, Daniel Morgan, Peter Dillon, Charles Cantrell, Lawrence Hellman, Plaintiff and Heidi Puckett re: admissions update and Plaintiff's response thereto 6/25/07 – 6/26/07	OCU-Johnson 15666-15668		X
77	Email from Plaintiff to Lawrence Hellman and Eric Laity re: Diversity calendar 11/7/07 and response thereto	OCU-Johnson 15684		X
78	Plaintiff's 2003- 2006 W-2's	D Johnson 00015-00017		X
79	October 27, 2005 Memo from Lawrence Hellman to Full-Time Faculty re: Full Professor Salary Information	D Johnson 00052		X
80	October 5, 2006 Memo from Lawrence Hellman to Law School Tenure and Tenure-Track Faculty re: Faculty Salary Resolution	D Johnson 00053		X
81	Emails between Plaintiff and Lawrence Hellman re: Plaintiff's salary 10/27/05 and 12/12/2005	OCU-Johnson 15494		X
82	OCU Form 990's and attached schedules from 1993-2007	D Johnson 00021-00049		X



83	Email from Plaintiff requesting to use Lawrence Hellman a reference for adoption 12/30/06 and response thereto	OCU-Johnson 15599		X
84	Recommendation for Incentive Pay for appointments committee 3/9/05	OCU-Johnson 11526	X	
85	Email from Plaintiff to Lawrence Hellman thanking him for bonus	OCU-Johnson 15444	X	
86	Recommendation for Incentive Pay for work on recruitment of minority faculty 6/9/05	OCU-Johnson 11528	X	
87	Recommendation for Incentive Pay for teaching and mentoring 7/14/05	OCU-Johnson 11527	X	
88	Email from Plaintiff to Lawrence Hellman thanking him for bonus 8/11/05	OCU-Johnson 15467	X	
89	Chart of Faculty Grants 1986-2008	OCU-Johnson 13373	X	
90	Email from Eric Laity to Lawrence Hellman with cc: to Plaintiff re: Plaintiff's next summer research grant and response thereto 4/30/09 – 5/1/09	Bates-number to be provided	X	
91	Letter from Lawrence Hellman to Plaintiff re: 2008 Summer Research Grant	OCU-Johnson 11437		X
92	Emails between Pam Ray and Lawrence Hellman re: faculty research assistants 12/22/08 – 1/9/09	OCU-Johnson 13497-13499	X	
93	Travel report re: Plaintiff	OCU-Johnson 16367		X
94	Travel reports faculty 2003-2009	OCU-Johnson 16368-16373	X	
95	Email from Plaintiff to Lawrence Hellman requesting a light load for Spring 2006 4/6/05 and responses thereto	OCU-Johnson 15441 & 15445	X	

96	Email from Plaintiff to Lawrence Hellman re: thanking him for supporting the women's tea 3/25/06	OCU-Johnson 15535		X
97	Letter from Robert Haupt to Steven L. Barghols re: mediation 6/2/2008	Bates-number to be provided	X	
98	Emails between Plaintiff and Deborah Fathree, Lawrence Hellman, Eric Laity and Emma Rolls re: Barrister's Ball 3/7/08 – 3/31/08	OCU-Johnson 15703-15705	X	
99	Email from Lawrence Hellman to Eric Laity and Deborah Fathree re: Barristers Ball 3/7/08	Bates-number to be provided	X	
100	Email from J. William Conger to Plaintiff, Patricia Hatamyar, Paula Dalley and Carla Spivak re: investigation status 3/16/08	D Johnson 00355	X	
101	Email from J. William Conger to Plaintiff, Paula Dalley and Carla Spivak re: investigation 3/26/08	D Johnson 00354		X
102	Emails between Carla Spivack, Plaintiff, and Paula Dalley re: meeting with J. William Conger 4/1/2008	D Johnson 00167-00168		X
103	Emails between Plaintiff and Paula Dalley and Carla Spivak re: meeting with J. William Conger and then forwarded by Plaintiff to Patricia Hatamyar 4/2/2008	D Johnson 00156-00159	X	
104	Email from Plaintiff to Lawrence Hellman re: Plaintiff being hit on butt by staff member 5/7/04 and Lawrence Hellman's response thereto	OCU-Johnson 15358-15359		X
105	EEOC Charge of Discrimination 7/10/08	OCU-Johnson 12822	X	
106	Amendment to Charge of Discrimination 7/21/08	OCU-Johnson 12832	X	
107	Notice of Right to Sue 7/23/09	OCU-Johnson 12830	X	

108	Notice of Right to Sue 9/4/08	OCU-Johnson 12827	X	
109	Medical records from Dr. Skarky	Johnson – Dr. Skarky 002-014	X	
110	Email from Plaintiff to Lawrence Hellman and Paula Dalley re: Deborah Fathree 5/16/08 and response thereto	OCU-Johnson 15718-15720		X
111	Email from Plaintiff to Lawrence Hellman and Paula Dalley re: suggestion of getting input for Deborah Fathree's evaluation and responses thereto	OCU-Johnson 15722-15723		X
112	FMLA request of Plaintiff 3/3/09	OCU-Johnson 14814		X
113	Memo from Bernie Patterson and Liz Hedrick to Plaintiff granting FMLA 3/11/09	OCU-Johnson 12815		X
114	Emails between Plaintiff and Bernie Patterson re: Plaintiff's decision to defer application for promotion 9/2/09 - 9/14/09	OCU-Johnson 12905		X
115	Email from Stuart Hene to Andrew Spiropolous and Michael O'Shea re: federalist society	Bates number to be provided	X	
116	6/19/07 Memorandum withdrawing grievance	Bates number to be provided	X	
117	Date rape drug flyer	OCU-Johnson 02198		X
118	Date rape drug card	OCU-Johnson 02197		X
119	Email from Marc Blitz to Lawrence Hellman re: additional comments about Constitution Day and panel organizing	OCU-Johnson 11625-11626		X
120	Rules for faculty meetings	OCU-Johnson 11677-11681		X
121	Diversity calendar	Bates number to		X

		be provided		
122	Chart of Committee Appointments	OCU-Johnson 05271-05273		X
123	Chart of Women on Panels or Speakers at Luncheons, Etc.	OCU-Johnson 02320-02324		X
124	Backup documentation for Chart of Women on Panels or Speakers at Luncheons, Etc.	OCU-Johnson 02318, 02340- 02479, 02481		X
125	Summary of Grades for Professor Bob Ravitz	OCU-Johnson 05304-05309		X
126	Backup documentation for Summary of Grades for Professor Bob Ravitz	OCU-Johnson 02308-02317		X
127	Chart of Course Assignments	OCU-Johnson 00021-00024		X
128	Backup documents for Chart of Course Assignments	OCU-Johnson 02949-03026		X
129	Memo from Lawrence Hellman to Peter Dillon 3/30/09	OCU-Johnson 06989-06911		X
130	Memo from Lawrence Hellman to Charles Cantrell 5/13/08	OCU-Johnson 06980		X
131	Memo from Lawrence Hellman to Charles Cantrell 8/29/08	OCU-Johnson 06977-06979		X
132	Salary chart of Vicki MacDougall and Art LeFrancois 1978-2008	OCU-Johnson 00152	X	
133	Salary chart of Patricia Hatamyar, Barry Johnson and Andrew Spiropolous 1994-2008	OCU-Johnson 00155	X	
134	Salary chart of Bernard, Harrell, LeFrancois, MacDougall, Blitz, Johnson, Oldfather, Long, Spivak 1994-2008	OCU-Johnson 00154	X	
135	2/3/03 Letter from Bernie Patterson and Tom McDaniel to Plaintiff	OCU-Johnson 11555-11556		X

136	University Faculty Handbook Policy 7.83 Sexual, Unlawful Discrimination	OCU-Johnson 00144 - 00147	X	
137	Faculty & Administration List of Names and Initial Year of Service	OCU-Johnson 00138-00140		X
138	Art LeFrancois Contract Dates & Titles	OCU-Johnson 00156	X	
139	Vicki MacDougall Contract Dates & Titles	OCU-Johnson 00157	X	
140	Merit Salary Administration Plan Adopted May 4, 2001	OCU-Johnson 00166		X
141	Self-Study of Marc Blitz 3/1/08	OCU-Johnson 02056-02062	X	
142	1/31/08 Memo from Andrew Spiropolous and Charles Cantrell to Promotion and Tenure Board re: promotion of Marc Blitz	OCU-Johnson 00527-00529	X	
143	Certification of Action by Promotion and Tenure Board re: Marc Blitz with attached report	OCU-Johnson 02052-02055	X	
144	Emails between Eric Laity and Lawrence Hellman, Plaintiff, Carla Spivak and Deborah Fathree re: action about date rape drugs with class announcement attached	OCU-Johnson 02110-02113, 02115-02117		X
145	Documents related to Inasmuch Foundation Grant	OCU-Johnson 02120-02139		X
146	Memos from Eric Laity to Richard Coulthard and personnel file	OCU-Johnson 02496-2505		X
147	12/7/07 Memo from Marc Blitz to Andrew Spiropolous and Charles Cantrell re: attention to diversity in panels and symposia that I have planned	OCU-Johnson 02523-02530	X	
148	Constitution Day Agenda 9/18/06	OCU-Johnson 02576	X	
149	OCU Law Magazine Special Edition on Women of Law Fall/Winter 2006	OCU-Johnson 09085-09132	X	

150	Nondiscrimination Policy	OCU-Johnson 03556	X	
151	Faculty Handbook	OCU-Johnson 03557-03648	X	
152	Plaintiff's 09-10 Contract	OCU-Johnson 12968		X
153	Plaintiff's 08-09 Contract	OCU-Johnson 12969		X
154	Plaintiff's 07-08 Contract	OCU-Johnson 12970		X
155	Plaintiff's 06-07 Contract	OCU-Johnson 12971		X
156	Plaintiff's 05-06 Contract	OCU-Johnson 12972		X
157	Plaintiff's 04-05 Contract	OCU-Johnson 12973		X
158	Plaintiff's 03-04 Contract	OCU-Johnson 12975		X
159	Memo to file from Norwood Beveridge re: Judson Temple 12/8/00	OCU-Johnson 08255-08257		X
160	Letter to Judson Temple from William Malloy 12/12/00	OCU-Johnson 08245-08247		X
161	Memo to file from Rennard Strickland re: Judson Temple 9/9/96	OCU-Johnson 08239		X
162	Memo from Lawrence Hellman to Judson Temple 6/4/99	OCU-Johnson 08259		X

Respectfully Submitted

s/ Courtney K. Warmington

Leonard Court, OBA #1948

Courtney K. Warmington, OBA #18486

Daniel P. Johnson, OBA #20742

-Of the Firm-

CROWE & DUNLEVY

A Professional Corporation

20 North Broadway

Suite 1800

Oklahoma City, OK 73102-8273

(405) 235-7700

(405) 239-6651 (Facsimile)

leonard.court@crowedunlevy.com

courtney.warmington@crowedunlevy.com

daniel.johnson@crowedunlevy.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 12<sup>th</sup> day of November, 2009, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the following ECF registrants:

Stanley M. Ward

Woodrow K. Glass

Scott F. Brockman

Scott K. Thomas

Zack K. Bradt

Ward & Glass, LLP

1821 N. Imhoff Road, Suite 102

Norman, Oklahoma 73071

(405) 360-9700

(405) 360-7902 FAX

s/ Courtney K. Warmington